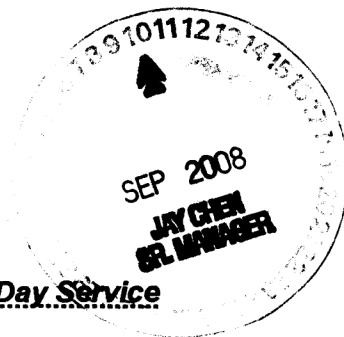




2402 East Anaheim • Wilmington, California 90744 • Telephone (562) 491-6877



September 4, 2008

Via UPS – Next Day Service

Mr. Jay Chen, P.E.
Senior Manager, Toxics and Waste Management
South Coast Air Quality Management District
Office of Engineering and Compliance
21865 Copley Drive
Diamond Bar, CA 91765-4178

Subject: Ultramar Inc.'s Comments on the Draft Title V Permit, dated July 01, 2008

Ultramar Inc. (Ultramar) has completed review of the South Coast Air Quality Management District (District) Draft Title V Federal Operating Permit (Draft Title V Permit), dated July 1, 2008. Ultramar appreciates that the District has incorporated many of the comments it provided in November 2007 based on a prior version of the Draft Title V Permit, and subsequent comments it submitted on July 2008 on the draft Title V Statement of Basis (SOB). However, some of Ultramar's comments still have not been included in the recently released Draft Title V Permit or SOB. Accordingly, this letter serves to memorialize the remaining comments that Ultramar believes must be addressed in the Final Title V Permit and SOB before they are finalized by the District. For ease of review, Ultramar's comments below are organized into comments on the SOB and comments on the Draft Title V Permit.

Statement of Basis

As previously identified in Ultramar's July 2008 comments, which were not corrected in the recently released SOB, several references in the SOB were either incomplete or inaccurately describe the applicable equipment subject to federal regulations. This includes the specific devices Ultramar identified as equipment subject to benzene NESHAP requirements (Table 4.4), equipment subject to 40 CFR Subpart CC, Gasoline Loading Rack (Table 4.8 and Table 4.10), and the Fluid Catalytic Cracking Unit subject to 40 CFR Subpart UUU (Table 4.11). Please see Ultramar's SOB comments dated July 2008.

Facility Permit (Section D &H)

Ultramar's review compared to its prior comments identified 147 comments (approximately 48% of the original 309 device-specific comments submitted in November 2007) that have still have not been incorporated into the Draft Title V Permit. These include a) comments that Ultramar has taken steps to resolve through the submittal of permit applications; and b) comments that are pending the conversion of historical permit applications from section H to section D in the permit. These are summarized by count into Section D and H in the table below. Details of the comments are provided in the corresponding attachments, as identified in the table.

Description	Attachment	Section		Total
		D	H	
Section H to Section D conversion	A	64	59	123
Applications not reflected in the permit	B	22	2	24

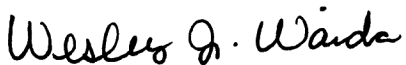
As a result of this and our review, Ultramar requests that the following items be completed prior to issuance of the Final Title V Permit.

1. Approval of the Ultramar Rule 1176 Plan, submitted on February 7, 2008. Once this plan is approved, a Section I revision is required to identify it as an approved plan in the permit.
2. District conversion from Section H to Section D of the following applications:

416631	462069	416622
370041	416627	433987
337582	323862	416628
416624	465660	
3. Processing, approval, and issuance of the seven permit applications Ultramar submitted in direct response to the District approach to resolving earlier comments made on the permit.
4. Processing, approval, and issuance of the two additional permit applications, one for the wastewater system and another to clarify dual-carbon unit equipment described in the fuel blending area, Ultramar submitted. These permit applications, while not directly the result of the permit review, should be included in the Final Title V Permit.

If you have any questions regarding the comments, please feel free to contact Susan Gonzales at (562) 491-6616 or me at (562) 491-6890.

Sincerely,



Wesley J. Waida
Environmental Manager
Valero Wilmington Refinery
Owned by Ultramar Inc., A Valero Company

Cc: Susan Gonzales, Staff Environmental Engineer
Darren Stroud, SAHQ

Draft Title V Permit Comments
Ultramar Facility: 800026

Conversions of Historical Applications from Permit to Construct to Permit to Operate

Item No.	Section	Device	Valero Comment
1	Section D	Device Drain System Components	Under Field Butane Caustic Treating (Process 10, System 8), add drain system component and assign new number. Tag new device with condition H23.4.
2	Section D	D48	Remove equipment from Section D: Permit To Construct and Temporary Permit To Operate, equipment was never installed.
3	Section D	D1248	Remove equipment from Section D: Permit To Construct and Temporary Permit To Operate, equipment was never installed.
4	Section D	D928	Remove equipment from Section D: Permit To Construct and Temporary Permit To Operate, equipment was never installed.
5	Section D	D947	Remove equipment from Section D. Equipment is re-permitted in Section H: Permit To Construct and Temporary Permit To Operate.
6	Section D	D948	Remove equipment from Section D. Equipment is re-permitted in Section H: Permit To Construct and Temporary Permit To Operate.
7	Section D	D76	Remove equipment from Section D. Equipment is re-permitted in Section H: Permit To Construct and Temporary Permit To Operate under D1484.
8	Section D	D77	Remove equipment from Section D. Equipment is re-permitted in Section H: Permit To Construct and Temporary Permit To Operate.
9	Section D	D78	Remove equipment from Section D. Equipment is re-permitted in Section H: Permit To Construct and Temporary Permit To Operate.
10	Section D	D79	Remove equipment from Section D. Equipment is re-permitted in Section H: Permit To Construct and Temporary Permit To Operate.
11	Section D	D80	Remove equipment from Section D. Equipment is re-permitted in Section H: Permit To Construct and Temporary Permit To Operate under D1485.
12	Section D	D81	Remove equipment from Section D. Equipment is re-permitted in Section H: Permit To Construct and Temporary Permit To Operate.
13	Section D	D82	Remove equipment from Section D. Equipment is re-permitted in Section H: Permit To Construct and Temporary Permit To Operate.
14	Section D	D84	Remove equipment from Section D. Equipment is re-permitted in Section H: Permit To Construct and Temporary Permit To Operate.
15	Section D	D85	Remove equipment from Section D. Equipment is re-permitted in Section H: Permit To Construct and Temporary Permit To Operate.
16	Section D	D87	Remove equipment from Section D. Equipment is re-permitted in Section H: Permit To Construct and Temporary Permit To Operate.
17	Section D	D88	Remove equipment from Section D. Equipment is re-permitted in Section H: Permit To Construct and Temporary Permit To Operate.
18	Section D	D96	Remove equipment from Section D. Equipment is re-permitted in Section H: Permit To Construct and Temporary Permit To Operate under D1490.
19	Section D	D1008	Remove the equipment from the permit. The device was removed during unit reconstruction.
20	Section D	D1010	Remove the equipment from the permit. The device was removed during unit reconstruction.
21	Section D	D1011	Remove equipment from Section D. Equipment is re-permitted in Section H: Permit To Construct and Temporary Permit To Operate.
22	Section D	D1137	Remove the equipment from the permit. The device was removed during unit reconstruction.
23	Section D	D1138	Remove the equipment from the permit. The device was removed during unit reconstruction.
24	Section D	D949	Remove equipment from Section D. Equipment is re-permitted in Section H: Permit To Construct and Temporary Permit To Operate.
25	Section D	D89	Remove the equipment from the permit. The device was removed during unit reconstruction.

Draft Title V Permit Comments

Ultramar Facility: 800026

Conversions of Historical Applications from Permit to Construct to Permit to Operate

Item No.	Section	Device	Valero Comment
26	Section D	D90	Remove equipment from Section D. Equipment is re-permitted in Section H: Permit To Construct and Temporary Permit To Operate.
27	Section D	D950	Remove equipment from Section D. Equipment is re-permitted in Section H: Permit To Construct and Temporary Permit To Operate.
28	Section D	D952	Remove equipment from Section D. Equipment is re-permitted in Section H: Permit To Construct and Temporary Permit To Operate.
29	Section D	D953	Remove equipment from Section D. Equipment is re-permitted in Section H: Permit To Construct and Temporary Permit To Operate.
30	Section D	D954	Remove equipment from Section D. Equipment is re-permitted in Section H: Permit To Construct and Temporary Permit To Operate.
31	Section D	D1288	Remove equipment from Section D. Equipment is re-permitted in Section H: Permit To Construct and Temporary Permit To Operate.
32	Section D	D1289	Remove equipment from Section D. Equipment is re-permitted in Section H: Permit To Construct and Temporary Permit To Operate.
33	Section D	D48	Remove from Section D: Device ID Index, equipment was never installed.
34	Section D	D76	Remove equipment from Section D: Device ID Index. Equipment is re-permitted in Section H: Permit To Construct and Temporary Permit To Operate under D1484.
35	Section D	D77	Remove from Section D: Device ID Index, equipment was never installed.
36	Section D	D78	Remove from Section D: Device ID Index, equipment was never installed.
37	Section D	D79	Remove from Section D: Device ID Index, equipment was never installed.
38	Section D	D80	Remove equipment from Section D: Device ID Index. Equipment is re-permitted in Section H: Permit To Construct and Temporary Permit To Operate under D1485.
39	Section D	D81	Remove from Section D: Device ID Index, equipment was never installed.
40	Section D	D82	Remove from Section D: Device ID Index, equipment was never installed.
41	Section D	D84	Remove from Section D: Device ID Index, equipment was never installed.
42	Section D	D85	Remove from Section D: Device ID Index, equipment was never installed.
43	Section D	D87	Remove from Section D: Device ID Index, equipment was never installed.
44	Section D	D88	Remove from Section D: Device ID Index, equipment was never installed.
45	Section D	D89	Remove from Section D: Device ID Index, equipment was never installed.
46	Section D	D90	Remove from Section D: Device ID Index, equipment was never installed.
47	Section D	D96	Remove equipment from Section D: Device ID Index. Equipment is re-permitted in Section H: Permit To Construct and Temporary Permit To Operate under D1490.
48	Section D	D928	Remove from Section D: Device ID Index, equipment was never installed.
49	Section D	D947	Remove from Section D: Device ID Index, equipment was never installed.
50	Section D	D948	Remove from Section D: Device ID Index, equipment was never installed.
51	Section D	D949	Remove from Section D: Device ID Index, equipment was never installed.
52	Section D	D950	Remove from Section D: Device ID Index, equipment was never installed.
53	Section D	D952	Remove from Section D: Device ID Index, equipment was never installed.
54	Section D	D953	Remove from Section D: Device ID Index, equipment was never installed.
55	Section D	D954	Remove from Section D: Device ID Index, equipment was never installed.
56	Section D	D1008	Remove from Section D: Device ID Index, equipment was never installed.
57	Section D	D1010	Remove from Section D: Device ID Index, equipment was never installed.
58	Section D	D1011	Remove from Section D: Device ID Index, equipment was never installed.
59	Section D	D1137	Remove from Section D: Device ID Index, equipment was never installed.
60	Section D	D1138	Remove from Section D: Device ID Index, equipment was never installed.
61	Section D	D1248	Remove from Section D: Device ID Index, equipment was never installed.
62	Section D	D1288	Remove from Section D: Device ID Index, equipment was never installed.
63	Section D	D1289	Remove from Section D: Device ID Index, equipment was never installed.

**Draft Title V Permit Comments
Ultramar Facility: 800026**

Conversions of Historical Applications from Permit to Construct to Permit to Operate

Item No.	Section	Device	Valero Comment
64	Section D	D238.1	Remove Device D1008 and D1011 from this condition. These devices no longer exist in the system.
65	Section H	D1249	Remove equipment from Section H: Permit To Construct and Temporary Permit To Operate, equipment was never installed.
66	Section H	D1481	Remove equipment from Section H: Permit To Construct and Temporary Permit To Operate, equipment was never installed.
67	Section H	D1482	Remove equipment from Section H: Permit To Construct and Temporary Permit To Operate, equipment was never installed.
68	Section H	D1483	Remove equipment from Section H: Permit To Construct and Temporary Permit To Operate, equipment was never installed.
69	Section H	D1486	Remove equipment from Section H: Permit To Construct and Temporary Permit To Operate, equipment was never installed.
70	Section H	D1487	Remove equipment from Section H: Permit To Construct and Temporary Permit To Operate, equipment was never installed.
71	Section H	D1488	Remove equipment from Section H: Permit To Construct and Temporary Permit To Operate, equipment was never installed.
72	Section H	D1489	Remove equipment from Section H: Permit To Construct and Temporary Permit To Operate, equipment was never installed.
73	Section H	D1491	Remove equipment from Section H: Permit To Construct and Temporary Permit To Operate, equipment was never installed.
74	Section H	D1497	Remove equipment from Section H: Permit To Construct and Temporary Permit To Operate, equipment was never installed.
75	Section H	D1502	Remove equipment from Section H: Permit To Construct and Temporary Permit To Operate, equipment was never installed.
76	Section H	D1503	Remove equipment from Section H: Permit To Construct and Temporary Permit To Operate, equipment was never installed.
77	Section H	D1504	Remove equipment from Section H: Permit To Construct and Temporary Permit To Operate, equipment was never installed.
78	Section H	D1506	Remove equipment from Section H: Permit To Construct and Temporary Permit To Operate, equipment was never installed.
79	Section H	D1507	Remove equipment from Section H: Permit To Construct and Temporary Permit To Operate, equipment was never installed.
80	Section H	D1508	Remove equipment from Section H: Permit To Construct and Temporary Permit To Operate, equipment was never installed.
81	Section H	D1510	Remove equipment from Section H: Permit To Construct and Temporary Permit To Operate, equipment was never installed.
82	Section H	D1512	Remove equipment from Section H: Permit To Construct and Temporary Permit To Operate, equipment was never installed.
83	Section H	D828	Remove equipment from Section H: Permit To Construct and Temporary Permit To Operate, equipment was never installed.
84	Section H	D1524	Remove equipment from Section H: Permit To Construct and Temporary Permit To Operate, equipment was never installed.
85	Section H	D127	Remove equipment from Section H: Permit To Construct and Temporary Permit To Operate, equipment was never installed.
86	Section H	D128	Remove equipment from Section H: Permit To Construct and Temporary Permit To Operate, equipment was never installed.
87	Section H	D859	Remove equipment from Section H: Permit To Construct and Temporary Permit To Operate, equipment was never installed.
88	Section H	D1255	Remove equipment from Section H: Permit To Construct and Temporary Permit To Operate, duplicate entry of equipment.
89	Section H	D1256	Remove equipment from Section H: Permit To Construct and Temporary Permit To Operate, duplicate entry of equipment.

Draft Title V Permit Comments
Ultramar Facility: 800026

Conversions of Historical Applications from Permit to Construct to Permit to Operate

Item No.	Section	Device	Valero Comment
90	Section H	D1133	Remove equipment from Section H: Permit To Construct and Temporary Permit To Operate, equipment was never installed.
91	Section H	D1554	Remove equipment from Section H: Permit To Construct and Temporary Permit To Operate, equipment was never installed.
92	Section H	D1555	Remove equipment from Section H: Permit To Construct and Temporary Permit To Operate, equipment was never installed.
93	Section H	D1556	Remove equipment from Section H: Permit To Construct and Temporary Permit To Operate, equipment was never installed.
94	Section H	D1524	Remove from Section H: Device ID Index, equipment was never installed.
95	Section H	D127	Remove from Section H: Device ID Index, equipment was never installed.
96	Section H	D128	Remove from Section H: Device ID Index, equipment was never installed.
97	Section H	D828	Remove from Section H: Device ID Index, equipment was never installed.
98	Section H	D859	Remove from Section H: Device ID Index, equipment was never installed.
99	Section H	D1133	Remove from Section H: Device ID Index, equipment was never installed.
100	Section H	D1249	Remove from Section H: Device ID Index, equipment was never installed.
101	Section H	D1255	Remove equipment from Section H: Permit To Construct and Temporary Permit To Operate, duplicate entry of equipment.
102	Section H	D1256	Remove equipment from Section H: Permit To Construct and Temporary Permit To Operate, duplicate entry of equipment.
103	Section H	D1481	Remove from Section H: Device ID Index, equipment was never installed.
104	Section H	D1482	Remove from Section H: Device ID Index, equipment was never installed.
105	Section H	D1483	Remove from Section H: Device ID Index, equipment was never installed.
106	Section H	D1486	Remove from Section H: Device ID Index, equipment was never installed.
107	Section H	D1487	Remove from Section H: Device ID Index, equipment was never installed.
108	Section H	D1488	Remove from Section H: Device ID Index, equipment was never installed.
109	Section H	D1489	Remove from Section H: Device ID Index, equipment was never installed.
110	Section H	D1491	Remove from Section H: Device ID Index, equipment was never installed.
111	Section H	D1497	Remove from Section H: Device ID Index, equipment was never installed.
112	Section H	D1502	Remove from Section H: Device ID Index, equipment was never installed.
113	Section H	D1503	Remove from Section H: Device ID Index, equipment was never installed.
114	Section H	D1504	Remove from Section H: Device ID Index, equipment was never installed.
115	Section H	D1506	Remove from Section H: Device ID Index, equipment was never installed.
116	Section H	D1507	Remove from Section H: Device ID Index, equipment was never installed.
117	Section H	D1508	Remove from Section H: Device ID Index, equipment was never installed.
118	Section H	D1510	Remove from Section H: Device ID Index, equipment was never installed.
119	Section H	D1512	Remove from Section H: Device ID Index, equipment was never installed.
120	Section H	D1514	Remove from Section H: Device ID Index, equipment was never installed.
121	Section H	D1554	Remove from Section H: Device ID Index, equipment was never installed.
122	Section H	D1555	Remove from Section H: Device ID Index, equipment was never installed.
123	Section H	D1556	Remove from Section H: Device ID Index, equipment was never installed.

Draft Title V Permit Comments
Ultramar Facility: 800026

Applications Not Reflected in Permit

Item No.	Device	Valero Comment	Tracking Action
1	D1285	Add "Lean Amine" before "Condensate Drum" in the equipment description.	Submitted in permit applications, not yet processed. See Application
2	Process 8, System 3	Remove this Process System from the permit. This system contains only two devices that were moved to Unit 67, Alky Feed Dryer.	See Application -8 submitted recently with District.
3	D964	Move equipment to Section D Process 2, System 1; Delayed Coking Unit. Change Tag ID "30-V-309".	See Application -5 submitted recently with District.
4	D1250	Remove equipment from Section D: Permit To Construct and Temporary Permit To Operate, equipment was never installed.	See Application -2 submitted recently with District.
5	D1351	Remove fugitive component device D1351. This system is not in VOC fugitive service.	See Application -3 submitted recently with District.
6	D1282	Add "Fresh" before "Amine" in the equipment description.	See Application -7 submitted recently with District.
7	D1283	Add "Lean" before "Amine Rundown" in the equipment description.	See Application -7 submitted recently with District.
8	D1286	Add "Lean Amine" before "Backflush" in the equipment description.	See Application -7 submitted recently with District.
9	D1284	Add "Lean" before "Amine Sump" in the equipment description.	See Application -7 submitted recently with District.
10	D174	Remove equipment from Section D: Permit To Construct and Temporary Permit To Operate, equipment was never installed.	See Application -7 submitted recently with District.
11	D175	Remove equipment from Section D: Permit To Construct and Temporary Permit To Operate, equipment was never installed.	See Application -7 submitted recently with District.
12	D176	Remove equipment from Section D: Permit To Construct and Temporary Permit To Operate, equipment was never installed.	See Application -7 submitted recently with District.
13	D1300	Remove equipment from Section D: Permit To Construct and Temporary Permit To Operate, equipment was never installed.	See Application -7 submitted recently with District.
14	D1301	Remove equipment from Section D: Permit To Construct and Temporary Permit To Operate, equipment was never installed.	See Application -7 submitted recently with District.
15	D174	Remove from Section D: Device ID Index, equipment was never installed.	See Application -7 submitted recently with District.
16	D175	Remove from Section D: Device ID Index, equipment was never installed.	See Application -7 submitted recently with District.
17	D176	Remove from Section D: Device ID Index, equipment was never installed.	See Application -7 submitted recently with District.
18	D964	Change equipment to Process 2 System 1.	See Application -5 submitted recently with District.

Draft Title V Permit Comments
Ultramar Facility: 800026

Applications Not Reflected in Permit

Item No.	Device	Valero Comment	Tracking Action
19	D1300	Remove from Section D: Device ID Index, equipment was never installed.	See Application -7 submitted recently with District.
20	D1301	Remove from Section D: Device ID Index, equipment was never installed.	See Application -7 submitted recentlywith District.
21	D1250	Remove from Section D: Device ID Index, equipment was never installed.	Follow up with AQMD about A/N 256041 status.
22	S15.6	Change System Condition to exclude equipment D1282, D1283, D1284 D1285, and D1286. This equipment is in lean amine service.	See application 7 submitted recently. See Page 7 of title V permit package.
22	D1351	Remove fugitive component device D1351. This system is not in VOC fugitive service.	See Application 3 submitted recently.
22	Condition A63.5	Add Device D932 and D935 to this condition, since they are connected to D74, which is subject to this condition.	See Application 4 submitted recently.